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Attorney for the United States
Acting under Authority Conferred by 28 U.S.C. § 515

FILED

Feb 26 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:25-cr-00053 MAG
Plaintiff,)	
v.)	<u>VIOLATIONS:</u>
NOAH ROSKIN-FRAZEE,)	18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(A) – Accessing a
Defendant.)	Protected Computer and Obtaining Information
)	18 U.S.C. §§ 982(a)(2)(B) and 1030(i) and (j) –
)	Forfeiture Allegation
)	
)	SAN FRANCISCO VENUE

I N F O R M A T I O N

The Attorney for the United States charges:

COUNT ONE: (18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(A) – Accessing a Protected Computer
Without Authorization and Obtaining Information)

Beginning on or about December 21, 2018 and continuing through a date unknown but at least
through on or about March 1, 2019, in the Northern District of California and elsewhere, the defendant,
NOAH ROSKIN-FRAZEE,
intentionally accessed a protected computer without authorization, and thereby obtained information, in
violation of Title 18, United States Code, Section 1030(a)(2)(C) and (c)(2)(A).

1 FORFEITURE ALLEGATION: (18 U.S.C. §§ 982(a)(2)(B) and 1030(i) and (j))

2 The allegations contained in this Information are re-alleged and incorporated by reference for the
3 purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(b) and
4 1030(i) and (j).

5 Upon conviction for the offense set forth in Count One of this Information, the defendant,
6 NOAH ROSKIN-FRAZEE,
7 shall forfeit to the United States: (1) all property, real or personal, constituting, or derived from proceeds
8 the defendant obtained directly and indirectly, as the result of those violations (pursuant to Title 18,
9 United States Code, Section 982(a)(2)(B)) and (2) any personal property that was used or intended to be
10 used to commit or to facilitate the commission of such violation (pursuant to Title 18, United States
11 Code, Sections 982(a)(2)(b) and 1030(i) and (j)).

12 If any of the property described above, as a result of any act or omission of the defendant:

13 a. cannot be located upon exercise of due diligence;

14 b. has been transferred or sold to, or deposited with, a third party;

15 c. has been placed beyond the jurisdiction of the court;

16 d. has been substantially diminished in value; or

17 e. has been commingled with other property which cannot be divided without difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title
19 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Sections
20 1030(i)(2) and 2461(c).

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1 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B), Title 28,
2 United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

3 DATED: February 25, 2025

MARTHA BOERSCH
Attorney for the United States
Acting Under Authority Conferred
by 28 U.S.C. § 515

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7 */s/ Nikhil Bhagat*

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NIKHIL BHAGAT
Assistant United States Attorney